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BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C.

JAN 30 1996

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In re Applications of ) MM DOCKET NO. 93-75  
)  
**TRINITY BROADCASTING OF FLORIDA,** ) File No. BRCT-911001LY  
**INC.** )  
)  
For Renewal of License of )  
Station WHFT(TV) on Channel 45, )  
Miami, Florida )  
)  
and )  
)  
**GLENDALE BROADCASTING COMPANY** ) File No. BPCT-911227KE  
)  
For a Construction Permit for a )  
New Commercial TV Station to )  
operate on Channel 45, Miami, )  
Florida )

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To: The Review Board

**MOTION FOR EXTENSION OF TIME AND OF PAGE LIMITATION**

Glendale Broadcasting Company (Glendale), by its attorneys, now asks that the time for all parties to file replies to the exceptions in this proceeding be extended from February 7, 1996 to February 21, 1996. Glendale also asks that it be allowed to file a consolidated reply brief of up to sixty pages.

The requested extension is needed to allow Glendale to thoroughly analyze the three sets of exceptions filed in this proceeding, review the extraordinarily large and complex record (over 5,000 pages of transcripts and over 500 exhibits), and prepare a concise but thorough response to the three sets of detailed exceptions filed in this proceeding. Counsel responsible for writing the reply brief must also

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write a reply brief due before the United States Court of Appeals which is due February 14. The requested extension is needed to allow counsel to adequately prepare both documents.

Glendale must address at least four separate issues in its reply brief. In order to respond to the exceptions filed by Trinity Broadcasting of Florida, Inc. (TBF), Trinity Broadcasting Network (TBN), and National Minority TV, Inc. (NMTV), Glendale will be required to review the large record in detail and respond in detail to their legal arguments. TBF, TBN, and the Mass Media Bureau also challenge the favorable resolution of one of the two qualifications issues specified against Glendale. Finally, TBF and TBN except to the Presiding Judge's failure to add certain additional issues against Glendale. Additional time will be needed to do the extensive work needed to respond to these arguments.

The complex and important nature of the issues in this proceeding also justify allowing Glendale to file a reply brief of not more than sixty pages in length. The three parties in this case have filed exceptions totalling eighty-two pages, and there is not extensive overlap between the various set of exceptions. In order to properly analyze the record, it will be necessary to review the record in detail and to carry out a detailed legal analysis, especially with respect to the issues specified against TBF. It is simply not possible for Glendale to respond to the multitude of points made in the various exceptions in twenty-five pages. A sixty


page reply brief will allow Glendale to make a thorough but concise response to the points raised in the exceptions.

Counsel for the Spanish American League Against Discrimination consents to a grant of this motion. Counsel for TBF, TBN, NMTV and the Mass Media Bureau interpose no objection to a grant of this motion.

Accordingly, Glendale asks that the Review Board extend the time for all parties to file reply briefs in this proceeding be extended to February 21, 1996, and that Glendale be allowed to file a reply brief of up to sixty pages.

Respectfully submitted,

**GLENDALE BROADCASTING COMPANY**

By   
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Date: January 30, 1996

**CERTIFICATE OF SERVICE**

I, Martin Tansey, a legal assistant employed by Bechtel & Cole, Chartered, do hereby certify that on the 30th day of January, 1996, a copy of the foregoing "Motion for Extension of Time and of Page Limitation" was sent first-class mail, postage prepaid to the following:

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Chairman, The Review Board  
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